AO 91 (Rev. 5/85) Criminal Complaint YOUNG/ARRESTED 07/19/2016 This form was electronically produced via OmniForm

FILED
JUL 20 2016
CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY LW
DEPUTY

United States District Court

WESTERN DISTRICT OF **TEXAS**

UNITED STATES OF AMERICA

V.

Austin WATSON
Rodric JACKSON

(Name and Address of Defendant)

CRIMINAL COMPLAINT

CASE NUMBER: 7:16-MJ-308

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **July 14, 2016** in **MIDLAND** county, in the **WESTERN** District of **TEXAS**, defendant(s) did, (Trace Statutory Language of Offense)

did knowingly and intentionally aid and abett each other to possess a firearm to wit: : 9mm Sig Sauer P939 (Serial #52B134152 manufactured in Exeter, New Hampshire) and a .40 caliber Beretta (Serial #A38931M manufactured in Italy) after having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely for , (WATSON) Burglary of Habitation 2rd degree felony in the 385th District Court Midland - Charge #9227341943 on 12/19/13 & (JACKSON) Credit Card or Debit Card Abuse in the 385th District Court Midland - Charge # 9174020447 on 8/21/14

in violation of Title **18**, United States Code, Section(s) **922 (g)(1) and 2**.

I further state that I am a(n) **Task Force Officer** and that this complaint is based on the following facts:
Official Title

SEE ATTACHMENT

Continued on the attached Sheet and made a part hereof: ☒ Yes ☐ No

Signature of Complainant

Sworn before me and subscribed in my presence,

7/20/16 at **Midland Texas**

Date | City and State

U.S. MAGISTRATE JUDGE DAVID COUNTS

Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

I, James Dolan, a Detective with the Midland Texas Police Department, currently assigned to the Drug Enforcement Administration (DEA) as a Task Force Officer (TFO), being duly sworn state:

1. I have successfully completed extensive training emphasizing narcotics investigation and law enforcement. I have been employed by the Midland Texas Police Department as a police officer and detective for approximately 11 ½ years and have participated in numerous narcotics investigations involving firearms violations. I have also attended courses based on investigating Narco-Terrorism and interdiction. In addition, I have operated in an undercover capacity during investigations where narcotics were purchased.

2. I am familiar with the facts and circumstances of this investigation as a result of my personal participation in the investigation referred to in this affidavit and information summarized in reports I have reviewed. I have compiled information derived from numerous discussions with experienced law enforcement officers, and detectives of the Midland Police Department. Since this complaint is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known by me in the investigation. More specifically, I have set forth only pertinent facts that I believe are necessary to establish probable cause. Based on the facts cited in the body of this affidavit, I believe that probable cause exists that **Austin WATSON and Rodric JACKSON,** aided and abetted by each other, did knowingly and intentionally possess firearms to wit: 9mm Sig Sauer P939 (Serial #52B134152 manufactured in Exeter, New Hampshire.) and a .40 caliber Beretta (Serial #A38931M manufactured in Italy) which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g) (1), after having been convicted of a crime punishable by imprisonment for a term exceeding one year,

namely for the felony offense, (WATSON) Burglary of Habitation 2rd degree felony in the 385th District Court Midland - Charge #9227341943 on 12/19/13 & (JACKSON) Credit Card or Debit Card Abuse in the 385th District Court Midland - Charge # 9174020447 on 8/21/14.

3. On July 14, 2016 several reports were made with the Midland Police Department in reference to a burglary of vehicles. Taken in one of the burglaries was an I-Pad and in another burglary a 9mm Sig Sauer P939 (S/N #52B134152) was taken.

4. On July 15, 2016 the complainant of the burglary of a vehicle where the I-Pad was taken contacted the Midland Police Department in reference to the I-Pad showing to be at a residence located 2405 College in Midland, Texas. Officers at this time responded to this particular residence and spoke with Brittney BAINE. BAINE was advised the reason Officers were there and showed Officers where the I-Pad could be located. Officers asked if there were any other items in the residence they should know about and at this time BAINE showed Officers where two firearms could be located. The firearms were a 9mm Sig Sauer P939 and a .40 caliber Beretta. A check of the firearms through the Midland Police Department dispatch revealed that the Sig Sauer had been previously been stolen from a vehicle. BAINE at this time lied to Officers about where the firearms came from and was arrested for possession of stolen property.

5. On July 16, 2016 Detective Demmer spoke with a Rodric JACKSON about the firearms in question specifically the 9mm Sig Sauer P939 and a .40 caliber Beretta. JACKSON stated that he and WATSON had previously stolen the firearms from vehicles earlier in the week. JACKSON stated that they had used BAINE's vehicle on the night of the burglaries. JACKSON stated that the guns were left at WATSON's residence.

6. On July 19, 2016 Officers located both WATSON and BAINE and they were transported to the Midland Police Department to be interviewed. Prior to the interview both subjects were read their *Miranda* warnings. BAINE stated that last week sometime JACKSON showed up

to her residence and then JACKSON and WATSON left in her vehicle. BAINE stated that they were going to rob people. When asked if BAINE meant burglarizing vehicles as robbing people she advised "yes". BAINE stated that later that night JACKSON and WATSON showed back up to the residence with the guns (a 9mm Sig Sauer P939 and a .40 caliber Beretta) and I-Pad.

7. WATSON stated that JACKSON had brought the guns over last week and asked WATSON to hold them. WATSON also stated that JACKSON asked WATSON if he could get rid of them for him.

8. Based on my training, expertise and experience, I believe **Austin WATSON and Rodric JACKSON** aided and abetted by each other did knowingly and intentionally possess firearms to wit: a 9mm Sig Sauer P938 (Serial #52B134152 manufactured in Exeter, New Hampshire) and a .40 caliber Beretta (Serial #A38931M manufactured in Italy) which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g) (1), after having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely for the felony offense, (WATSON) Burglary of Habitation 2rd degree felony in the 385th District Court Midland - Charge #9227341943 on 12/19/13 & (JACKSON) Credit Card or Debit Card Abuse in the 385th District Court Midland - Charge # 9174020447 on 8/21/14.

James Dolan
Task Force Officer
Drug Enforcement Administration

7/20/16
Date

Sworn to and subscribed before me in my presence.

David Counts
United States Magistrate Judge

7/20/16
Date